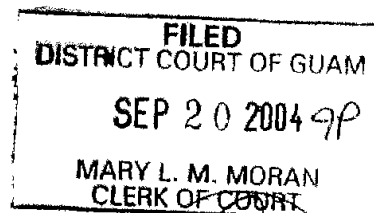


William L. Gavras, Esq.
LAW OFFICES OF GORMAN & GAVRAS
A Professional Corporation
2nd Floor, J&R Building
208 Route 4
Hagåtña, Guam 96910
Telephone: 472-2302
Facsimile: 472-2342

Attorneys for Plaintiffs
ROBERT J. DEL ROSARIO and
MELANIE DEL ROSARIO



IN THE DISTRICT COURT OF GUAM

ROBERT J. DEL ROSARIO and
MELANIE DEL ROSARIO,

CIVIL CASE NO. 04-00028

Plaintiffs,

vs.

DISCOVERY PLAN

JAPAN AIRLINES INTERNATIONAL
CO., LTD.,

Defendant.

_____ /

DISCOVERY PLAN

Pursuant to Rule 26 (f) of the Federal Rules of Civil Procedure and Local Rule 16.2, the parties agree to and hereby submit the following plan:

A. Depositions of fact witnesses may begin at once and be taken as needed, prior to the discovery cutoff date. Some of the parties may call expert witnesses in this case.

B. Unless additional discovery is ordered by the Court, the parties also may propound interrogatories (25 maximum) and requests for admissions (25 maximum). Neither the interrogatories nor the request for admissions are limited to "one set"; rather,

the limitation is on the maximum number permitted. Requests for production may also be propounded with no limit on amount. This discovery shall be served in such a fashion as to be subject to answer or response on or before the discovery cutoff date.

C. The parties, except as otherwise noted, agree to provide all prediscovery and preliminary discovery mandated by Local Rules and FRCP Rule 26 by October 29, 2004. Compliance with mandatory disclosure as is set forth in Rule 26 (a) (1) is on-going.

D. All parties will exchange names and reports (if any) of expert witnesses on or before January 31, 2005, and rebuttal reports, if any, by February 23, 2005.

E. The specific subjects on which discovery may be needed are:

Facts supporting the nature of the claims and defenses.

F. Other than the provisos set forth above in Item B, the parties do not anticipate requiring any other changes or limitations on discovery as imposed under the Federal and Local Rules.

G. The Cutoff date for written discovery is December 31, 2004. The discovery Cutoff for lay and expert witness depositions is April 1, 2005.

APPROVED AS TO FORM AND CONTENT:

GORMAN & GAVRAS

Dated: September 20, 2004

BY: 

WILLIAM L. GAVRAS, ESQ.

Attorneys for Plaintiff

ROBERT J. DEL ROSARIO and

MELANIE DEL ROSARIO

CARLSMITH BALL LLP

Dated: September 20, 2004

BY: 

DAVID P. LEDGER, ESQ.
Attorneys for Defendant
JAPAN AIRLINES INTERNATIONAL CO.,
LTD.